



RAFFAELE  
PUPPIO

Raffaele Puppio | 19 West Third Street | Media PA 19063 | Phone 610.891.6710  
Fax 610.891.9985 | www.raffaeleandpuppio.com

Katherine H. Meehan, Esquire  
E-Mail: [Meehan@randplaw.com](mailto:Meehan@randplaw.com)

RECEIVED JUL 24 2012 *lgt*

May 31, 2012

Ms. Sharon Jaffess, Chief  
Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604-3590



RE: Request for Information Pursuant to Section 104 of CERCLA for the Texas  
Township Drum Site in Kalamazoo County, Michigan; CERCLIS ID: MIN000510313

Dear Ms. Jaffess:

Please be advised that Michael V. Puppio of this office serves as the solicitor for the Garnet Valley School District. As such, we are in receipt of your letter to Superintendent, Dr. Michael Christian, which was received by the School District on May 16, 2012. In response to your request for information, the School District has engaged in a thorough search of its records and has consulted with its environmental engineer and vendors concerning any connection or agreement with Donald Haugen, Environmental Network, Inc., and/or Chemical Assistance, Inc. All information we have searched indicates that Garnet Valley School District has not used or contracted, directly or indirectly, with any of the aforementioned parties. I am enclosing a more formal response to EPA's requests.

Please feel free to contact me with any questions.

Thank you for your courtesies.

Sincerely,

Katherine H. Meehan

KHM/

Enclosures

cc: Dr. Michael Christian  
Mr. Bruce Craig

**GARNET VALLEY SCHOOL DISTRICT'S RESPONSE TO  
Enclosure B  
Requests**

**i) Identify all persons consulting in the preparation of the answers to these Information Requests.**

GVSD Business Manager, Tom Delaney  
GVSD Director of Operations, Bruce Craig  
GVSD Supervisor of Maintenance, Wade Brosius  
Environmental Engineer, Environmental Control Systems, Barbara Lippman and Clean  
Venture/Cycle Chem  
Architects, David Lynch Associates and MM Architects  
Eagle Industrial Hygienist, former Environmental Engineer

**ii) Identify all documents consulted, examined or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.**

GVSD General Ledgers from 2000/01 through June 2007 (see attached summary)  
Certificates of Disposal (see attached)

**iii) If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.**

Barbara Lippman, President, Environmental Control Systems  
(610) 587-6016

**iv) Did you ever enter into an oral or written contract or otherwise do business with either Chemical Assistance, Inc., Environmental Network, Inc., or Donald Haugen for the purpose of arranging for the storage, treatment or disposal of waste materials? If you did, please identify the following:** Garnet Valley School District has not contracted with these entities/individual, either orally or in writing, and has not done business with them.

- a) **The persons with whom you or such other persons made such arrangements;**  
N/A
- b) **The contact information for each person with whom such arrangements were made;** N/A
- c) **Every date on which such arrangements took place;** N/A
- d) **For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid)**

**and the process for which the substance was used or the process which generated the substance; N/A**

**e) The owner of the waste materials or hazardous substances so accepted to transported; N/A**

**f) The quantity of the waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions; N/A**

**g) All tests, analyses and analytical results concerning the waste materials; N/A**

**h) The person(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported; N/A**

**i) The amount paid in connection with each transaction, the method of payment and the identity of the person from whom payment was received; N/A**

**j) Where the person identified in g. above intended to have such hazardous substances or waste materials transported and all evidence of this intent; N/A**

**k) Whether the waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal; N/A**

**l) The final disposition of each of the waste materials or hazardous substances involved in such transactions; N/A.**

**m) The measures taken by you to determine the actual methods, means and site of treatment or disposal of the waste material and hazardous substances involved in each transaction; N/A**

**n) The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers; N/A**

**o) The price paid for (i) transport or (ii) disposal of (iii) or both, of each waste material and hazardous substance; N/A**

**p) All documents containing information responsive to a)-p) above, or in lieu of identification of all relevant documents, provide copies of all such documents; N/A**

**q) All persons with knowledge, information or documents responsive to questions a through p, above. N/A**

10.2600.431.001.50.00.000.00 Building maint & repairs  
3/10/03 MC 02005422 1 61034 GRNDWATER ANALYTICAL&DRUM DISP 10235 GEOLOGICAL SE 8,200.94

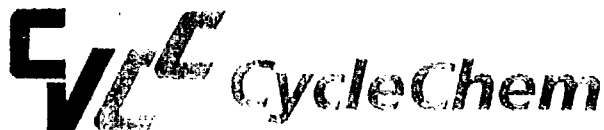
10.2700.433.001.40.00.000.00 Vehicle maint & repairs  
7/16/01 OP 01004050 1 40056 USED MOTOR OIL REMOVAL 6655 NOTE WASTE OI 60.00  
7/17/01 OP 00004020 1 40082 WASTE COMBUSTIBLE LIQUID 230 SAFETY-KLEEN 195.70  
1/15/03 OP 02004068 1 60855 DISPOSAL OF USED MOTOR OIL 6655 NOTE WASTE OI 70.00  
1/15/03 OP 02004108 1 60855 DISPOSAL OF USED MOTOR OIL 6655 NOTE WASTE OI 75.00  
2/10/03 OP 02004109 1 61253 DISPOSAL OF ANTI-FREEZE 6655 NOTE WASTE OI 85.00  
5/09/03 OP 02004129 1 62030 REMOVAL OF WASTE OIL & WATER 6655 NOTE WASTE OI 85.00  
10/08/03 OP 03004069 1 63533 REMOVAL OF WASTE OIL 6655 NOTE WASTE OI 120.00  
8/09/04 OP 04004081 1 66062 REMOVAL OF USED LUBE OIL 6655 NOTE WASTE OI 125.00  
11/09/04 OP 04004062 1 67248 REMOVAL OF WASTE OIL & ANTIFREEZE 6655 NOTE WASTE OI 210.00  
2/08/05 OP 04004062 1 68014 REMOVAL OF WASTE OIL 6655 NOTE WASTE OI 125.00  
7/14/05 OP 05004062 1 69313 REMOVAL OF USED OIL 6655 NOTE WASTE OI 125.00  
9/14/05 OP 05004062 1 69837 REMOVAL OF USED OIL 6655 NOTE WASTE OI 150.00  
10/09/06 OP 06004062 1 73633 DISPOSAL OF USED MOTOR OIL 6655 NOTE WASTE OI 250.00

10.2600.411.001.50.00.000.00 Disposal Svcs - Trash  
3/09/06 OP 05005238 1 71796 PICK UP OF HAZARD RED BAGS 11181 STERICYCLE, I 156.66  
5/04/06 OP 05005259 1 72312 P/U HAZARDOUS WASTE 11181 STERICYCLE, I 78.33  
6/13/06 OP 05005271 1 72555 PICK UP OF RED BAGS FROM OFC 11181 STERICYCLE, I 78.33  
7/18/06 OP 06005085 1 72775 STERI-SAFE SELECT-MONTHLY 11181 STERICYCLE, I 78.33  
8/16/06 OP 06005085 1 73048 STERI-SAFE SELECT-MONTHLY 11181 STERICYCLE, I 78.33  
9/12/06 OP 06005085 1 73271 MEDICAL WASTE REMVL 11181 STERICYCLE, I 78.33  
10/11/06 OP 06005085 1 73724 WASTE REMVL 08/06 11181 STERICYCLE, I 82.96  
1/10/07 OP 06005085 1 74809 MEDICAL WASTE REMVL 11/06 11181 STERICYCLE, I 97.06  
1/10/07 OP 06005085 1 74809 MEDICAL WASTE REMVL 12/06 11181 STERICYCLE, I 97.06  
2/08/07 OP 06005085 1 75141 MEDICAL WASTE REMVL 11181 STERICYCLE, I 97.06  
2/08/07 OP 06005085 1 75141 MEDICAL WASTE REMVL 11181 STERICYCLE, I 97.06  
3/05/07 OP 06005085 1 75389 MEDICAL WASTE REMVL 11181 STERICYCLE, I 876.72  
5/09/07 OP 06005085 1 75853 MEDICAL WASTE REMVL 11181 STERICYCLE, I 814.66

55 Gallon Sealed Drums

Salerno Tires  
Tires of  
Tire of Purchase  
Oil Filter - Safety  
Tires - Safety  
Tires - Safety

Note Waste Oil!  
No Charge Any more  
Included cut for Tanks



Recycling Treatment & Disposal of Hazardous Waste

May 24, 2012

GARNET VALLEY SCHOOL DIST  
566 SMITHBRIDGE ROAD  
GLEN MILLS, PA 19342

Broker: Valued Customer  
CLEAN VENTURE, INC.  
600 CENCO BLVD  
CLAYTON, NJ 08312

Re: Certificate of Disposal  
Work Order # 81711  
GARNET VALLEY SCHOOL DIST  
566 SMITHBRIDGE ROAD  
GLEN MILLS, PA 19342

Dear Sir/Madam:

This letter is to certify that Cyclechem, Inc. (EPA ID No. NJD002200046) has accepted and processed the following shipments.

This acceptance is in accordance with all state & federal regulations and with the requirements set forth in Cycle Chem's Hazardous Waste Facility Permit.

| Prod Code               | Manifest In     | Date In    | Manifest Out | Date Out   | Sent   | Disposal Facility                  | Disposal Method                        |
|-------------------------|-----------------|------------|--------------|------------|--------|------------------------------------|--|
| <i>*off-spec (orig)</i> |                 |            |              |            |        |                                    |  |
| AA                      | 000841068JJK-1  | 11/30/2007 | BOL056488A   | 04/18/2008 | 1 x DF | WM-PA GROWS/<br>Tullytown Landfill | stabilization/landfill                 |
| MM                      | 000841068JJK-2  | 11/30/2007 | 003636687JJK | 04/16/2008 | 1 x DF | Veolia ES (Port<br>Washington, WI) | retort                                 |
| UDF/R                   | 000841068JJK-3  | 11/30/2007 | 003636890JJK | 06/20/2008 | 1 x DF | Stablex Canada, Inc                | stabilization/landfill                 |
| AB/R                    | 000841068JJK-4  | 11/30/2007 | BOL056092A   | 03/14/2008 | 1 x DF | WM-PA GROWS/<br>Tullytown Landfill | stabilization/landfill                 |
| TWI                     | 000841068JJK-5  | 11/30/2007 | 003636743JJK | 05/12/2008 | 1 x DF | Heritage-WTI, Inc.                 | incineration                           |
| STOL                    | 000841068JJK-6  | 11/30/2007 | 003636890JJK | 06/20/2008 | 1 x DF | Stablex Canada, Inc                | stabilization                          |
| UOX                     | 000841068JJK-7  | 11/30/2007 | 003636883JJK | 06/16/2008 | 1 x DF | Dupont Company                     | waste water treatment/fuel<br>blending |
| TWI                     | 000841068JJK-8  | 11/30/2007 | 003636743JJK | 05/12/2008 | 1 x DF | Heritage-WTI, Inc.                 | incineration                           |
| STHG                    | 000841068JJK-9  | 11/30/2007 | 003636890JJK | 06/20/2008 | 1 x DF | Stablex Canada, Inc                | stabilization/landfill                 |
| UIK                     | 000841068JJK-10 | 11/30/2007 | 003636782JJK | 05/22/2008 | 1 x DM | Dupont Company                     |  |

If there are any further questions about the management of your waste, please do not hesitate to call.

Sincerely

Rick Otto  
General Manager

New Jersey TSDF:  
217 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
FAX: 908-355-0562

Corporate Office:  
201 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
FAX: 908-355-3495

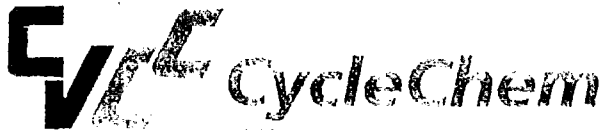
Pennsylvania TSDF:  
550 Industrial Drive  
Lewisberry, PA 17339  
717-938-4700  
Fax: 717-938-3301

Massachusetts TSDF:  
General Chemical  
138 Leland Street  
Framingham, MA 01702  
508-872-5000  
FAX: 508-875-5271

[www.cyclechem.com](http://www.cyclechem.com)

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Recycling Treatment & Disposal of Hazardous Waste

May 24, 2012

GARRET VALLEY SCHOOL DIST.  
566 SMITHBRIDGE ROAD  
GLEN MILLS, PA 19342

Broker: Valued Customer  
CLEAN VENTURE, INC.  
600 CENCO BLVD  
CLAYTON, NJ 07206

Re: Certificate of Disposal  
GARRET VALLEY SCHOOL DIST. (Work Order # 78503)  
566 SMITHBRIDGE ROAD  
GLEN MILLS, PA 19342

Dear Sir/Madam:

This letter is to certify that Cycle Chem, Inc. (EPA ID No. NJD002200046) has accepted and processed the following shipments.

This acceptance is in accordance with all state & federal regulations and with the requirements set forth in Cycle Chem's Hazardous Waste Facility Permit.

| Prod Code<br><i>*off-spec (orig)</i> | Manifest In     | Date In    | Manifest Out | Date Out   | Sent   | Disposal Facility                    | Disposal Method         |
|--------------------------------------|-----------------|------------|--------------|------------|--------|--------------------------------------|-------------------------|
| STOL/R                               | 000220124FLE-1  | 08/24/2007 | 001025345JJK | 11/28/2007 | 1 x DM | Stablex Canada, Inc                  | stabilization           |
| AC                                   | 000220124FLE-2  | 08/24/2007 | BOL055718A   | 02/07/2008 | 1 x DM | WM-PA<br>GROWS/Tullytown<br>Landfill | neutralization/landfill |
| SPC                                  | 000220124FLE-3  | 08/24/2007 | 001025273JJK | 11/02/2007 | 1 x DM | Veolia ES (Sauget, IL<br>TWI)        | incineration            |
| STNS                                 | 000220124FLE-4  | 08/24/2007 | 003636890JJK | 06/20/2008 | 1 x DM | Stablex Canada, Inc                  | stabilization/landfill  |
| MM                                   | 000220124FLE-5  | 08/24/2007 | 003636687JJK | 04/16/2008 | 1 x DM | Veolia ES (Port<br>Washington, WI)   | retort                  |
| TWI                                  | 000220124FLE-6  | 08/24/2007 | 001025273JJK | 11/02/2007 | 1 x DM | Veolia ES (Sauget, IL<br>TWI)        | incineration            |
| TWI                                  | 000220124FLE-7  | 08/24/2007 | 001025396JJK | 01/14/2008 | 1 x DM | Heritage-WTI, Inc.                   | incineration            |
| UIK                                  | 000220124FLE-8  | 08/24/2007 | 001025372JJK | 01/02/2008 | 1 x DM | Safety-Kleen NJ                      | energy recovery         |
| UDM                                  | 000220124FLE-9  | 08/24/2007 | 003636616JJK | 03/17/2008 | 1 x DM | Dupont Company                       | wastewater treatment    |
| STHG                                 | 000220124FLE-10 | 08/24/2007 | 003636890JJK | 06/20/2008 | 1 x DM | Stablex Canada, Inc                  | stabilization/landfill  |
| TWI                                  | 000220124FLE-11 | 08/24/2007 | 003636502JJK | 02/08/2008 | 1 x DM | Veolia ES (Sauget, IL<br>TWI)        | incineration            |

If there are any further questions about the management of your waste, please do not hesitate to call.

Sincerely  
  
Rick Otto  
General Manager

New Jersey TSDF:  
217 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
FAX: 908-355-0562

Corporate Office:  
201 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
FAX: 908-355-3495

Pennsylvania TSDF:  
550 Industrial Drive  
Lewisberry, PA 17339  
717-938-4700  
Fax: 717-938-3301

Massachusetts TSDF:  
General Chemical  
138 Leland Street  
Framingham, MA 01702  
508-872-5000  
FAX: 508-875-5271

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Recycling Treatment & Disposal of Hazardous Waste

May 17, 2012

GARNET VALLEY SCHOOL DIST  
566 SMITHBRIDGE ROAD  
GLEN MILLS, PA 19342

Broker: Valued Customer  
CLEAN VENTURE, INC.  
600 CENCO BLVD  
CLAYTON, NJ 08312

Re: Certificate of Disposal  
Work Order # 84335  
GARNET VALLEY SCHOOL DIST  
566 SMITHBRIDGE ROAD  
GLEN MILLS, PA 19342

Dear Sir/Madam:

This letter is to certify that Cyclechem, Inc. (EPA ID No. NJD002200046) has accepted and processed the following shipments.

This acceptance is in accordance with all state & federal regulations and with the requirements set forth in Cycle Chem's Hazardous Waste Facility Permit.

| Prod Code               | Manifest In    | Date In    | Manifest Out | Date Out   | Sent   | Disposal Facility             | Disposal Method                    |
|-------------------------|----------------|------------|--------------|------------|--------|-------------------------------|------------------------------------|
| <i>*off-spec (orig)</i> |                |            |              |            |        |                               |                                    |
| UIK                     | 000841243JJK-1 | 03/10/2008 | 003636917JJK | 06/30/2008 | 1 x DM | Safety-Kleen NJ               | energy recovery                    |
| LPEST                   | 000841243JJK-2 | 03/10/2008 | 001034110JJK | 10/25/2008 | 1 x DM | Clean Harbors (El Dorado, AR) | incineration                       |
| UDM                     | 000841243JJK-3 | 03/10/2008 | BOI.057851A  | 07/21/2008 | 1 x DM | Lorco Petroleum Services      | waste water treatment/oil recovery |
| SPEST                   | 000841243JJK-4 | 03/10/2008 | 003636943JJK | 07/18/2008 | 1 x DM | Clean Harbors (El Dorado, AR) | incineration                       |
| UNH                     | 000841243JJK-5 | 03/10/2008 | 003636960JJK | 07/30/2008 | 1 x DM | Dupont Company                | wastewater treatment               |
| CR2                     | 000841243JJK-6 | 03/10/2008 | 003636788JJK | 05/23/2008 | 1 x DM | Cemco Inc.                    | recycle/reuse                      |
| CR1                     | 000841243JJK-7 | 03/10/2008 | 003636627JJK | 03/27/2008 | 1 x DM | CRI Environment, Inc.         | fuel blending                      |

If there are any further questions about the management of your waste, please do not hesitate to call.

Sincerely,

Rick Otto  
General Manager

New Jersey TSDF:  
217 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
FAX: 908-355-0562

Corporate Office:  
201 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
FAX: 908-355-3495

Pennsylvania TSDF:  
550 Industrial Drive  
Lewisberry, PA 17339  
717-938-4700  
Fax: 717-938-3301

Massachusetts TSDF:  
General Chemical  
138 Leland Street  
Framingham, MA 01702  
508-872-5000  
FAX: 508-875-5271

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Recycling Treatment & Disposal of Hazardous Waste

May 17, 2012

GARNET VALLEY SCHOOL DIST  
566 SMITHBRIDGE ROAD  
GLEN MILLS, PA 19342

Broker: Valued Customer  
CLEAN VENTURE, INC.  
600 CENCO BLVD.  
CLAYTON, NJ 08312

Re: Certificate of Disposal  
Work Order # 91015  
GARNET VALLEY SCHOOL DIST  
566 SMITHBRIDGE ROAD  
GLEN MILLS, PA 19342

Dear Sir/Madam:

This letter is to certify that Cyclechem, Inc. (EPA ID No. NJD002200046) has accepted and processed the following shipments.

This acceptance is in accordance with all state & federal regulations and with the requirements set forth in Cycle Chem's Hazardous Waste Facility Permit.

| Prod Code               | Manifest In  | Date In    | Manifest Out | Date Out   | Sent   | Disposal Facility                    | Disposal Method |
|-------------------------|--------------|------------|--------------|------------|--------|--------------------------------------|-----------------|
| <i>*off-spec (orig)</i> |              |            |              |            |        |                                      |                 |
| PC01                    | CVCC116299-1 | 10/01/2008 | BOI.059596A  | 11/22/2008 | 1 x DM | WM-PA<br>GROWS/Tullytown<br>Landfill | landfill        |

If there are any further questions about the management of your waste, please do not hesitate to call.

Sincerely

Rick Otto  
General Manager

New Jersey TSDF:  
217 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
FAX: 908-355-0562

Corporate Office:  
201 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
FAX: 908-355-3495

Pennsylvania TSDF:  
550 Industrial Drive  
Lewisberry, PA 17339  
717-938-4700  
Fax: 717-938-3301

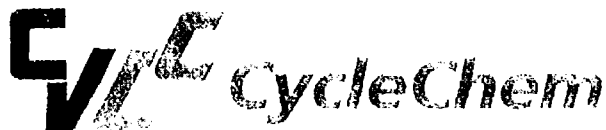
Massachusetts TSDF:  
General Chemical  
138 Leland Street  
Framingham, MA 01702  
508-872-5000  
FAX: 508-875-5271

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Recycling Treatment & Disposal of Hazardous Waste

May 17, 2012

GARNET VALLEY SCHOOL DIST  
566 SMITHBRIDGE ROAD  
GLEN MILLS, PA 19342

Broker: Valued Customer  
CLEAN VENTURE, INC.  
600 CENCO BLVD.  
CLAYTON, NJ 08312

Re: Certificate of Disposal  
Work Order # 97271  
GARNET VALLEY SCHOOL DIST  
566 SMITHBRIDGE ROAD  
GLEN MILLS, PA 19342

Dear Sir/Madam:

This letter is to certify that Cyclechem, Inc. (EPA ID No. NJD002200046) has accepted and processed the following shipments.

This acceptance is in accordance with all state & federal regulations and with the requirements set forth in Cycle Chem's Hazardous Waste Facility Permit.

| Prod Code               | Manifest In  | Date In    | Manifest Out | Date Out   | Sent   | Disposal Facility                    | Disposal Method |
|-------------------------|--------------|------------|--------------|------------|--------|--------------------------------------|-----------------|
| <i>*off-spec (orig)</i> |              |            |              |            |        |                                      |                 |
| PC04                    | CVCC127908-1 | 05/05/2009 | BOL061619A   | 05/06/2009 | 1 x TT | WM-PA<br>GROWS/Tullytown<br>Landfill | landfill        |
| PC04                    | CVCC127909-1 | 05/05/2009 | BOL061591A   | 05/05/2009 | 1 x TT | WM-PA<br>GROWS/Tullytown<br>Landfill | landfill        |

If there are any further questions about the management of your waste, please do not hesitate to call.

Sincerely

  
Rick Otto  
General Manager

New Jersey TSDF:  
217 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
FAX: 908-355-0562

Corporate Office:  
201 South First Street  
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FAX: 908-355-3495

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550 Industrial Drive  
Lewlsberry, PA 17339  
717-938-4700  
Fax: 717-938-3301

Massachusetts TSDF:  
General Chemical  
138 Leland Street  
Framlingham, MA 01702  
508-872-5000  
FAX: 508-875-5271

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Recycling Treatment & Disposal of Hazardous Waste

May 17, 2012

GARNET VALLEY SCHOOL DISTRICT CO  
PCS INC  
FRANCIS HARVEY GREEN SCHOOL  
80 STATION ROAD  
GLEN MILLS, PA 19342

Broker: CYCLE CHEM OF LEWISBERRY, INC.  
550 INDUSTRIAL DRIVE  
LEWISBERRY, PA 17339

Re: Certificate of Disposal  
Work Order # 116042  
GARNET VALLEY SCHOOL DISTRICT CO PCS INC  
FRANCIS HARVEY GREEN SCHOOL  
80 STATION ROAD  
GLEN MILLS, PA 19342

Dear Sir/Madam:

This letter is to certify that Cyclechem, Inc. (EPA ID No. NJD002200046) has accepted and processed the following shipments.

This acceptance is in accordance with all state & federal regulations and with the requirements set forth in Cycle Chem's Hazardous Waste Facility Permit.

| Prod Code | Manifest In | Date In | Manifest Out | Date Out | Sent | Disposal Facility | Disposal Method |
|-----------|-------------|---------|--------------|----------|------|-------------------|-----------------|
|-----------|-------------|---------|--------------|----------|------|-------------------|-----------------|

*\*off-spec (orig)*

|        |                |            |              |            |        |                           |          |
|--------|----------------|------------|--------------|------------|--------|---------------------------|----------|
| PCBM22 | 000854154JJK-1 | 11/19/2010 | 001054058GBF | 12/13/2010 | 2 x DM | CWM Chemical Services LLC | landfill |
|--------|----------------|------------|--------------|------------|--------|---------------------------|----------|

If there are any further questions about the management of your waste, please do not hesitate to call.

Sincerely

Rick Otto  
General Manager

New Jersey TSDF:  
217 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
FAX: 908-355-0562

Corporate Office:  
201 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
FAX: 908-355-3495

Pennsylvania TSDF:  
550 Industrial Drive  
Lewisberry, PA 17339  
717-938-4700  
Fax: 717-938-3301

Massachusetts TSDF:  
General Chemical  
138 Leland Street  
Framlingham, MA 01702  
508-872-5000  
FAX: 508-875-5271

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Recycling Treatment & Disposal of Hazardous Waste

May 24, 2012

GARNET VALLEY SCHOOL DISTRICT  
552 SMITH BRIDGE ROAD  
GLEN MILLS, PA 19342

Broker: CLEAN VENTURE, INC.  
600 CENCO BLVD  
CLAYTON, NJ 08312

Re: Certificate of Disposal  
Work Order # 117268  
GARNET VALLEY SCHOOL DISTRICT  
552 SMITH BRIDGE ROAD  
GLEN MILLS, PA 19342

Dear Sir/Madam:

This letter is to certify that Cyclechem, Inc. (EPA ID No. NJD002200046) has accepted and processed the following shipments.

This acceptance is in accordance with all state & federal regulations and with the requirements set forth in Cycle Chem's Hazardous Waste Facility Permit.

| Prod Code               | Manifest In    | Date In    | Manifest Out | Date Out   | Sent   | Disposal Facility                 | Disposal Method |
|-------------------------|----------------|------------|--------------|------------|--------|-----------------------------------|-----------------|
| <i>*off-spec (orig)</i> |                |            |              |            |        |                                   |                 |
| PC04LP                  | 006875071JJK-1 | 01/07/2011 | BOL069355A   | 05/04/2011 | 1 x DF | Clean Water of New York, Inc.     | oil recycling   |
| AC                      | 006875071JJK-2 | 01/07/2011 | BOL070321A   | 11/16/2011 | 1 x DF | WM-PA<br>GROWS/Tullytown Landfill | landfill        |
| STOL                    | 006875071JJK-3 | 01/07/2011 | 001055160GBF | 05/17/2011 | 1 x DF | Stablex Canada, Inc               | stabilization   |
| REP                     | 006875071JJK-4 | 01/07/2011 | 001054090GBF | 01/14/2011 | 1 x DF | Heritage-WTI, Inc.                | incineration    |
| REP                     | 006875071JJK-5 | 01/07/2011 | 001054090GBF | 01/14/2011 | 1 x DF | Heritage-WTI, Inc.                | incineration    |

If there are any further questions about the management of your waste, please do not hesitate to call.

Sincerely

  
Rick Otto  
General Manager

New Jersey TSDF:  
217 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
FAX: 908-355-0562

Corporate Office:  
201 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
FAX: 908-355-3495

Pennsylvania TSDF:  
550 Industrial Drive  
Lewisberry, PA 17339  
717-938-4700  
Fax: 717-938-3301

Massachusetts TSDF:  
General Chemical  
138 Leland Street  
Framlingham, MA 01702  
508-872-5000  
FAX: 508-875-5271

[www.cyclechem.com](http://www.cyclechem.com)

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## Recycling Treatment &amp; Disposal of Hazardous Waste

May 24, 2012

GARNET VALLEY SCHOOL DISTRICT  
80 STATION ROAD  
GLEN MILLS, PA 19342

Broker: CLEAN VENTURE, INC.  
600 CENCO BLVD  
CLAYTON, NJ 08312

Re: Certificate of Disposal  
GARNET VALLEY SCHOOL DISTRICT (Work Order # 117263)  
80 STATION ROAD  
GLEN MILLS, PA 19342

Dear Sir/Madam:

This letter is to certify that Cycle Chem, Inc. (EPA ID No. NJD002200046) has accepted and processed the following shipments.

This acceptance is in accordance with all state & federal regulations and with the requirements set forth in Cycle Chem's Hazardous Waste Facility Permit.

| Prod Code<br><i>*off-spec (orig)</i> | Manifest In     | Date In    | Manifest Out | Date Out   | Sent   | Disposal Facility                  | Disposal Method                  |
|--------------------------------------|-----------------|------------|--------------|------------|--------|------------------------------------|----------------------------------|
| MM                                   | 006875134JJK-1  | 01/07/2011 | 001055154GBF | 06/08/2011 | 1 x DF | Veolia ES (Port Washington, WI)    | retort                           |
| VRA                                  | 006875134JJK-2  | 01/07/2011 | 000959014GBF | 01/25/2012 | 1 x DF | Heritage-WTI, Inc.                 | incineration                     |
| AA                                   | 006875134JJK-3  | 01/07/2011 | BOL069476A   | 05/23/2011 | 1 x DF | WM-PA GROWS/<br>Tullytown Landfill | landfill                         |
| VRA                                  | 006875134JJK-4  | 01/07/2011 | 000959095GBF | 03/21/2012 | 1 x DF | Heritage-WTI, Inc.                 | incineration                     |
| UIK                                  | 006875134JJK-5  | 01/07/2011 | 001055286GBF | 08/11/2011 | 1 x DF | Veolia ES (Middlesex NJ)           | energy recovery                  |
| VRA                                  | 006875134JJK-6  | 01/07/2011 | 000959095GBF | 03/21/2012 | 1 x DF | Heritage-WTI, Inc.                 | incineration                     |
| STOL                                 | 006875134JJK-7  | 01/07/2011 | 000958924GBF | 11/11/2011 | 1 x DF | Stablex Canada, Inc                | chemical reduction/stabilization |
| AB                                   | 006875134JJK-8  | 01/07/2011 | BOL069195A   | 04/07/2011 | 1 x DF | WM-PA GROWS/<br>Tullytown Landfill | landfill                         |
| PC04LP                               | 006875134JJK-9  | 01/07/2011 | BOL069355A   | 05/04/2011 | 1 x DM | Clean Water of New York, Inc.      | oil recycling                    |
| *PC01 (PC04)                         | 006875134JJK-10 | 01/07/2011 | BOL069012A   | 03/04/2011 | 1 x DM | WM-PA GROWS/<br>Tullytown Landfill | neutralization/landfill          |
| PC05AL                               | 006875134JJK-11 | 01/07/2011 | BOL069422A   | 05/17/2011 | 1 x DF | WM-PA GROWS/<br>Tullytown Landfill | landfill                         |
| STOXL                                | 006875134JJK-12 | 01/07/2011 | 001055207GBF | 06/16/2011 | 1 x DM | Stablex Canada, Inc                | stabilization/landfill           |
| CR1                                  | 006875134JJK-13 | 01/07/2011 | 001055096GBF | 04/14/2011 | 1 x DF | GRR-Attalla                        | fuel blending                    |

If there are any further questions about the management of your waste, please do not hesitate to call.

Sincerely  
  
Rick Otto  
General Manager

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217 South First Street  
Elizabeth, NJ 07206  
908-355-5800  
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Recycling Treatment & Disposal of Hazardous Waste

May 17, 2012

GARNET VALLEY SCHOOL DIST  
566 SMITHBRIDGE ROAD  
GLEN MILLS, PA 19342

Broker: CLEAN VENTURE, INC.  
600 CENCO BLVD  
CLAYTON, NJ 08312

Re: Certificate of Disposal  
Work Order # 117267  
GARNET VALLEY SCHOOL DIST  
566 SMITHBRIDGE ROAD  
GLEN MILLS, PA 19342

Dear Sir/Madam:

This letter is to certify that Cyclechem, Inc. (EPA ID No. NJD002200046) has accepted and processed the following shipments.

This acceptance is in accordance with all state & federal regulations and with the requirements set forth in Cycle Chem's Hazardous Waste Facility Permit.

| Prod Code               | Manifest In    | Date In    | Manifest Out | Date Out   | Sent   | Disposal Facility              | Disposal Method                     |
|-------------------------|----------------|------------|--------------|------------|--------|--------------------------------|-------------------------------------|
| <i>*off-spec (orig)</i> |                |            |              |            |        |                                |                                     |
| UIK                     | 006875072JJK-1 | 01/07/2011 | 001055229GBF | 07/07/2011 | 1 x CF | Veolia ES (Middlesex NJ)       | energy recovery                     |
| R067                    | 006875072JJK-2 | 01/07/2011 | 001055148GBF | 05/03/2011 | 1 x DF | Ross Incineration Services     | incineration                        |
| *PC01 (PC04)            | 006875072JJK-3 | 01/07/2011 | BOL068922A   | 02/10/2011 | 1 x CF | WM-PA GROWS/Tullytown Landfill | landfill                            |
| UIK                     | 006875072JJK-4 | 01/07/2011 | 001055084GBF | 04/01/2011 | 1 x CF | Dupont Company                 | waste water treatment/fuel blending |

If there are any further questions about the management of your waste, please do not hesitate to call.

Sincerely

Rick Otto  
General Manager

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Elizabeth, NJ 07206  
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